

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

QUALCOMM INC., a Delaware corporation,
and QUALCOMM TECHNOLOGIES, INC.,
a Delaware corporation,

Plaintiffs,

v.

ARM HOLDINGS PLC, f/k/a ARM LTD., a
U.K. corporation,

Defendant.

REDACTED - PUBLIC VERSION
(Filed November 21, 2025)

C.A. No. 24-490-MN

[REDACTED]

**DEFENDANT ARM HOLDINGS PLC'S MOTION FOR SUMMARY JUDGMENT
THAT SECTION █ OF THE TLA AND ALA IS UNENFORCEABLE**

Defendant Arm Holdings plc (“Arm”) respectfully moves this Court, pursuant to Federal Rule of Civil Procedure 56(a), for an order, substantially similar to the proposed order attached hereto, granting summary judgment that Section █ of the TLA and Section █ of the ALA is unenforceable. The grounds for this motion are set forth in Arm’s Omnibus Opening Brief in Support of its Motions for Summary Judgment, Arm’s Concise Statement of Undisputed Material Facts in Support of its Motion for Summary Judgment that Section █ of the TLA and ALA is Unenforceable (“█ SOF”), the Declaration of Adam Janes in Support of Arm’s Motion for Summary Judgment, associated exhibits, and other submissions, filed contemporaneously herewith.

WHEREFORE, Arm respectfully requests that this Court grant this motion and enter an order substantially in the form attached hereto, and for such other relief as the Court deems just and proper.

Dated: October 24, 2025

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 24, 2025, a copy of the foregoing document was served on the counsel listed below in the manner indicated:

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ARM HOLDINGS PLC, f/k/a ARM LTD., a
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C.A. No. 24-490-MN

**[PROPOSED] ORDER GRANTING DEFENDANT ARM HOLDINGS PLC'S MOTION
FOR SUMMARY JUDGMENT THAT SECTION █ OF THE TLA
AND ALA IS UNENFORCEABLE**

The Court has considered Defendant Arm Holdings plc's Motion for Summary Judgment that Section █ of the TLA and ALA is Unenforceable filed by Defendant Arm Holdings plc ("Arm") and the supporting papers; the opposition filed by Plaintiffs Qualcomm Inc. and Qualcomm Technologies, Inc. ("Qualcomm"); Arm's reply; and any other papers and argument submitted by the parties.

Having found sufficient basis therefore, the Court hereby GRANTS Arm's Motion for Summary Judgment that Section █ of the TLA and ALA is Unenforceable, and IT IS HEREBY ORDERED THAT:

- Section █ of the Technology License Agreement ("TLA") between Arm and Qualcomm is unenforceable;
- Section █ of the Architecture License Agreement ("ALA") between Arm and Qualcomm is unenforceable; and
- Judgment is entered in favor of Arm and against Qualcomm on Counts I.B, I.F, and I.H of Plaintiffs' Second Amended Complaint (Dkt. 137).

SO ORDERED, this _____ day of _____, 2025.

The Honorable Maryellen Noreika
United States District Judge